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20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 NAVAJO HEALTH FOUNDATION – SAGE
 23 MEMORIAL HOSPITAL, INC. (doing business
 24 as “Sage Memorial Hospital”); an Arizona non-
 25 profit corporation

26 Plaintiff,

27 v.

28 RAZAGHI DEVELOPMENT COMPANY,
 LLC; a Nevada limited liability company (doing
 business as “Razaghi Healthcare”), et al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**JOINT STIPULATION TO
 EXTEND TIME FOR
 DEFENDANTS TO ANSWER OR
 OTHERWISE RESPOND TO
 PLAINTIFF’S THIRD AMENDED
 COMPLAINT [ECF NO. 192]**

(SECOND REQUEST)

IT IS HEREBY STIPULATED AND AGREED, pursuant to FRCP 6 and LR IA 6-1 and subject to this Court’s approval, that Defendants Razaghi Development Company, LLC, Ahmad Razaghi, and Tausif Hasan (collectively “Defendants”) shall have an extension of time, up to and including August 19, 2022 to respond to or otherwise answer Plaintiff’s Third Amended Complaint (ECF No. 192).

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The parties stipulate to the above extension due to defense counsels' current case load, Defendants' availability, and in consideration of the volume and complexity of the issues in this case. Specifically, Defendants require additional time to investigate and formulate a response to the Third Amended Complaint which is 132 pages, with 278 numbered paragraphs plus an additional 80 *pages* of subparts. The Third Amended Complaint contains 27 additional pages plus revisions to the Plaintiff's allegations contained in the Second Amended Complaint. Due to the sheer volume of these allegations, Defendants require additional time to evaluate the claims and prepare their response thereto. Defendants make their request through August 19, 2022 because Defendant Razaghi is unavailable for a two-week period during this timeframe due to personal reasons. This is the second request to extend Defendants' deadline to respond to the Third Amended Complaint.

This request is made in good faith and not for the purpose of delay. Neither party will be prejudiced by the requested extension.

For the reasons set forth above, the parties ask the Court to approve this stipulation and allow Defendants up to and including **August 19, 2022** to respond to or otherwise answer the Third Amended Complaint (ECF No. 192).

RESPECTFULLY SUBMITTED this 19th day of July 2022.

/s/ Paul S. Padda (with permission)
 Kathleen Bliss, Esq.
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IT IS SO ORDERED; provided, however, no further extensions of time will be granted.


 UNITED STATES MAGISTRATE JUDGE

Dated: July 19, 2022